



March 7, 2014

Via ECFS (WC Docket No. 10-90)  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: SPITwSPOTS, Inc. (FRN:0022431860)  
Phase II Experiments: Expression of Interest**

Dear Ms. Dortch:

By this letter, SPITwSPOTS, Inc. responds to the Federal Communications Commission's January 31, 2014 request for expressions of interest to participate in the Phase II rural broadband experiments.

SPITwSPOTS is a fixed wireless broadband service provider based in Alaska. SPITwSPOTS has deployed wireless infrastructure in the 900 MHz, 2.4 GHz, 3.65 GHz and 5.470-5.825 GHz bands that is used to provide valuable broadband services to consumers within the Kenai Peninsula Borough in Alaska. Many customers live in extremely rural, remote areas of the state that are costly to serve with broadband.

In reviewing the Wireline Competition Bureau's current list of "potentially suitable" locations for rural broadband experiments, SPITwSPOTS anticipates that it would be interested in funding for services to, among others, some or all of the census tracts with numbers beginning "21220." SPITwSPOTS understands that the list of eligible areas remains in development based on the Bureau's cost modeling; accordingly, once the Commission finalizes the criteria for participation and the eligible census blocks, SPITwSPOTS can better identify the locations it would seek to serve in a Phase II experiment. SPITwSPOTS is financially and technically capable of providing the relevant services.

SPITwSPOTS proposes to build upon its existing infrastructure and to use fixed wireless technology to provide services consistent with current offerings. Last-mile connections to end users would be made via Ubiquiti point-to-radio systems operating in the 5 GHz range. Licensed backhaul would be provided via SAF Tehnika equipment, and in key locations there would be fiber uplinks to SPITwSPOTS's upstream provider.

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We anticipate pricing of subsidized services to be consistent with other offerings from SPITwSPOTS. For example, at present we have packages of 4 Mbps downstream and 4 Mbps upstream for \$84 per month, while our package of 10 Mbps downstream and 10 Mbps upstream is priced at \$104 per month. In any case, SPITwSPOTS intends to adopt pricing that is consistent with the broader objectives of the FCC's Connect America Fund.

SPITwSPOTS may consider outreach to state, local or Tribal governments to determine whether any participation by these entities would aid in SPITwSPOTS's efforts to deploy broadband in unserved areas. Given the difficulties in providing service to these extremely rural areas of Alaska, SPITwSPOTS may wish to interface with local authorities on, for example, zoning and colocation matters. Until the Bureau's list of eligible census blocks is finalized, however, it is difficult to speculate what role and governmental participation might take.

SPITwSPOTS anticipates that while its proposed fixed wireless deployments can be made cost-effectively with one-time support from a Connect America Fund Phase II experiment, the actual economics can only be estimated at this time in light of the ongoing uncertainty regarding the areas that would be eligible for funding. Accordingly, SPITwSPOTS makes no specific commitment or estimate at this time regarding the timing and amounts of requested support.

Please contact the undersigned with any questions regarding this expression of interest.

**SPITwSPOTS, Inc.**

/s/   
Aaron Larson, President